

New York State Department of Environmental Conservation
Division of Environmental Remediation
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Denise M. Sheehan
Acting
Commissioner

June 13, 2005

Mr. Robert W. Teets
Vice President
Environmental Affairs and Risk Management
Cooper Industries
P.O. Box 4446
Houston, Texas 77210

Re: Preliminary Site Assessment Report for the Crouse-Hinds Landfills, Syracuse, New York
(Site No. 7-34-004)

Dear Mr. Teets:

The New York State Department of Environmental Conservation (NYSDEC) has reviewed the document entitled "Preliminary Site Assessment Report, North and South Landfills, Crouse-Hinds Facility, Syracuse, New York", dated September 29, 2004 (PSA Report). The PSA Report is not approvable as written. Enclosed are NYSDEC's comments on the PSA Report, excluding comments on the Fish and Wildlife Impact Analysis (FWIA). Comments on the FWIA will be transmitted to Cooper Industries at a later date.

The NYSDEC looks forward to receiving a response to the enclosed comments, and a work plan for additional PSA work to be conducted this season. If you have any questions regarding this letter, I may be contacted *via* telephone at (518) 402-9767.

Sincerely,

Richard A. Mustico, P.E.
Project Manager
Remedial Bureau B
Division of Environmental Remediation

enclosure

c: Carol Conyers, Esq. - DEE
James Burke - NYSDEC, Syracuse
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General Comment: A site figure which clearly shows the location of the wetland areas and any ponded areas on site should be included in the document.

Figure 2-1: Ley Creek should clearly be shown adjacent to the South Landfill, similar to what is illustrated for the North Landfill. Please note how sample locations were selected (*i.e.*, surface runoff, visible leachate, depositional areas, *etc.*).

Section 2.3.1, Test Pit Excavation Soil Sampling, page 2-5, Section 2.3.2 Surface Soil Sampling, page 2-6: Please note whether samples were analyzed for the full TCL/TAL.

Section 2.3.2 Surface Soil Sampling, page 2-6: Please indicate the depth of surface soil samples, and note whether surface soil samples were collected from leachate release areas, drainage swales or other visually impacted areas.

Section 2.3.3 Leachate Sampling, page 2-6: Please note whether leachate samples underwent TCL/TAL analysis.

Section 2.4 Ley Creek Sampling, page 2-7: Figure 2-1 should provide the location of SW-6. It should be indicated why only sediment was collected from SED-6. Please indicate whether sediment samples underwent grain size and TOC analysis and whether surface water samples were analyzed for hardness. These data are necessary to properly screen contaminants against screening values.

Section 2.5 Storm Sewer Assessment, page 2-7: Crouse-Hinds should locate as-built blueprints to determine the location of the former storm sewer.

Tables 3-6 and 3-7 Sediment Sample Analytical Results: The sediment criteria appear to be calculated incorrectly. Please use the TOC results to calculate the sediment criteria per the Department's Technical Guidance for Screening Contaminated Sediments.

Section 3.4.3 Sediment Analytical Results, page 3-20 (second bullet): This pesticide (gamma-BHC) was also identified in SED-5 which is a duplicate of SED-3.

Section 3.4.4 Surface Water Analytical Results, page 3-20: Please indicate why surface water samples were not collected from sample location SED-6.

Section 4.1 Soil Investigation, page 4-2, second bullet: Further delineation of the fill material should include sampling in the wetlands areas as well as "acres of low-lying ponded water."

Section 4.2 Hydrogeologic Investigation, page 4-6: In the first bullet on the page the presence of free floating product (NAPL) needs further discussion and delineation. The hypothesis that well MW-5 is in the source area of the NAPL should be confirmed. In the second to last bullet on the page the statement that metals in the groundwater "showed no discernable differences in concentrations or distribution" should be supported by providing upgradient and background values. Also, this statement seems to contradict the next bullet which states that the downgradient areas of the Site are impacted by VOCs, SVOCs and metals. This should be

clarified.

Section 4.3 Surface Water Investigation, pages 4-7 - 4-8: The last bullet indicates that there is the potential for leachate to discharge to a ponded area and a swale. Therefore the impacts of the leachate to ecological receptors should be assessed (using appropriate surface water and sediment screening values).

Section 4.4 Sediment Investigation, pages 4-9 - 4-10, first bullet: Delete the last sentence of the first bullet of the section. ("In addition, the presence of PCBs in onsite soils may be attributable to the historic flooding of Ley Creek.") The sampling results indicate that PCBs on-site are not from PCB contamination in Ley Creek, as PCB Aroclor 1242 was not detected on-site, but is the main PCB Aroclor in Ley Creek.

Section 4.6 Recommendations, page 4-12, first bullet of page: Surface water samples should include sampling for calcium and magnesium, in order to calculate water hardness, which is necessary to determine certain surface water standards.

Section 4.6 Recommendations, page 4-11, second bullet: A wetland delineation should be conducted.

Section 4.6 Recommendations, page 4-11, second bullet: Total Organic Carbon should be analyzed for in sediment samples to determine certain sediment criteria.

Section 4.6 Recommendations, page 4-11, third bullet: The "short list" of target analytes should be defined for, and approved by, the Department prior to sampling.

Section 4.6 Recommendations, page 4-12: The extent of free product in the vicinity of well MW-5 needs to be addressed (third bullet).

Section 4.6 Recommendations, page 4-12, forth bullet of page: The bullet should be deleted. The site is listed as a New York State Inactive Hazardous Waste Site. Listed hazardous waste exists on-site. In addition, under New York State law hazardous waste includes hazardous substances for the Environmental Remediation program with respect to classification of hazardous waste sites.

Section 4.6 Recommendations, page 4-12, fifth bullet of page: The bullet should be deleted. After all PSA data is collected, the Department will determine is additional investigation, such as an RI/FS is warranted.